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WORLD'S FIRST CO-OPERATIVE REFINERY



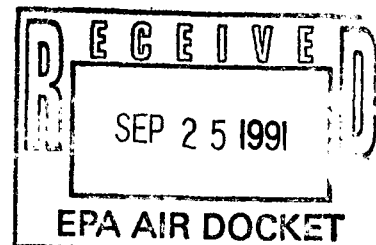
**Consumers'
Co-operative
Refineries Limited**

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September 19, 1991

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Environmental Protection Agency
Public Docket A-91-46
Air Docket (LE-131)
401 M Street S.W., Room M-1500
Washington, D.C. 20460



Re: Ethyl HiTEC^(R) 3000 (MMT)

Consumers' Co-operative Refineries Ltd. is a regional Refiner located in Regina, Saskatchewan Canada. The capacity of the Refinery is 50,000 barrels/day, producing a full range of petroleum fuels including three grades of unleaded gasoline.

Our products are sold to some 350 local Co-operative Retails known as the Co-operative Retailing System in the provinces of Saskatchewan, Manitoba, Alberta and British Columbia.

Unleaded gasoline products from Consumers' Co-operative Refinery facilities have been blended utilizing Ethyl HiTEC 3000 (MMT), at a dosage of up to 0.067 grams of manganese per gallon, since 1978.

The utilization of Ethyl HiTEC 3000 (MMT) has been an extremely important blending component for unleaded gasoline for economic product quality improvement and control with respect to octane quality.

During the entire thirteen year period of our utilization of Ethyl HiTEC 3000 (MMT), from 1978 to 1991, we have not encountered any field problems relating to plugging of automotive catalysts due to the additive.

We are impressed by Ethyl Corporation's fleet test, which has shown that the use of Ethyl HiTEC 3000 performance additive in gasoline significantly reduces automotive emissions of NO_x by 0.11 grams per mile or approximately 20 percent. We feel that the use of this additive can make a key contribution towards a cleaner environment.

In conclusion, based on our thirteen years of experience in using Ethyl HiTEC 3000 additive, we strongly support Ethyl Corporation's

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request for a waiver under the Clean Air Act to allow the use of HiTEC 3000 performance additive in gasoline at a concentration of 1/32 gram of manganese per gallon.

Yours truly



B.F. DAHLSTROM, SENIOR VICE PRESIDENT - REFINING

BFD:jpg

c.c. Mary T. Smith
Director, Field Operations and Support Division (EN-397F)
U. S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460